

EXHIBIT A

5. The “Action” means *United Benefit Fund v. GlaxoSmithKline LLC*, No. 07-md-1871, Civ. Action No. 10-5419.

6. “Avandia” means Avandia, Avandamet, and Avandaryl.

7. “Diabetes Drug” means any drug taken for the purpose of treating Type II diabetes, and includes, but is not limited to, Avandia, Rezulin, Actos, Actosplus met, metformin, sulfonylureas, insulin, and incretin-mimetic therapies.

8. “CMO” means Re-amended Case Management Order No. 1, No. 07-md-1871, Doc. No. 4911 (E.D. Pa. July 6, 2016).

9. “Complaint” means the “Complaint” filed on October 14, 2010.

10. “PBM” means any pharmacy benefit manager that UBF has used in connection with the provision of pharmacy benefits to its participants, including but not limited to Express Scripts, Inc.

11. “Response” means United Benefit Fund’s Response to Defendants’ Motion to Compel Compliance with Re-amended Case Management Order No. 1, No. 07-md-1871, Doc. No. 4988 (E.D. Pa. Sept. 9, 2016).

12. The term “and” includes “or,” and the term “or” includes “and,” as needed to make the request inclusive and not exclusive.

13. The term “any” includes “all,” and the term “all” includes “any,” as needed to make the request inclusive and not exclusive.

14. The term “concerning” means reflecting, related, relating to, referring to, describing, evidencing, or constituting.

15. The term “including” means mean “including without limitation.”

16. The relevant time period, unless otherwise specified, is 1999 to the present.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

You began representing UBF in the Action beginning in January 2016.

REQUEST FOR ADMISSION NO. 2:

You did not begin to work with UBF to locate documents that you anticipated class representatives would need to produce to GSK until February 2016.

REQUEST FOR ADMISSION NO. 3:

You did not contact UBF’s PBMs with respect to documents you anticipated that class representatives would need to produce to GSK until February 2016.

REQUEST FOR ADMISSION NO. 4:

The CMO required UBF to produce the documents and data listed on Schedule A of the CMO by June 17, 2016.

REQUEST FOR ADMISSION NO. 5:

Before June 17, 2016, You did not consult with any other counsel that at any time represented UBF in the Action concerning documents and data listed on Schedule A of the CMO.

REQUEST FOR ADMISSION NO. 6:

You did not subpoena UBF's PBMs for documents and data listed on Schedule A of the CMO until June 20, 2016.

REQUEST FOR ADMISSION NO. 7:

You did not inform GSK or the Court that UBF could not produce the documents and data listed on Schedule A of the CMO until June 23, 2016.

REQUEST FOR ADMISSION NO. 8:

On August 5, 2016, at your recommendation, UBF filed a motion for voluntary dismissal of its claims in the Action.

REQUEST FOR ADMISSION NO. 9:

Attached to the August 5, 2016 motion referenced in Request for Admission No. 8 above was a declaration of David DeLucia, stating that UBF was unable to produce documents responsive to GSK's requests, that responsive documents and data were in its PBM's custody, and that UBF decided to voluntarily dismiss its case to allow the other putative class members to proceed with their claims without delay.

REQUEST FOR ADMISSION NO. 10:

You did not consult with David DeLucia about the reasons for UBF's inability to produce documents and the basis for UBF's dismissal before the declaration referenced in Request for Admission No. 9 above was presented to David DeLucia for his signature.

REQUEST FOR ADMISSION NO. 11:

On September 9, 2016, You filed the Response on UBF's behalf.

REQUEST FOR ADMISSION NO. 12:

The Response states that attorneys Douglas Sanders and Mark Linder recall a meeting at which representatives for UBF produced a large stack of paper, consisting of about 500 pages, but that neither Douglas Sanders nor Mark Linder reviewed the stack of papers in minute detail.

REQUEST FOR ADMISSION NO. 13:

To Your knowledge, the 500 pages referenced in Request for Admission No. 12 above were lost sometime between the meeting referenced in Request for Admission No. 12 and September 9, 2016.

REQUEST FOR ADMISSION NO. 14:

Before the filing of the Response, You did not inform GSK or the Court that the documents referenced in Request for Admission No. 12 above had been lost.

REQUEST FOR ADMISSION NO. 15:

Paragraph 9 of the Complaint alleged that GSK caused false and misleading presentations concerning safety, efficacy and lack of purported side effects to be made to physicians and those paying for Avandia, including third-party payors such as UBF.

REQUEST FOR ADMISSION NO. 16:

UBF's Opposition to Defendant GlaxoSmithKline LLC Motion to Dismiss Plaintiffs' Complaints and to Strike Nationwide Class Allegations, No. 10-cv-5419, Doc. No. 9, states that GSK ignores the particularized allegations of misrepresentations, half-truths and distortions made directly to UBF and other third party payors, PBMs, consumers, and/or physicians.

REQUEST FOR ADMISSION NO. 17:

You never confirmed whether other counsel that at any time represented UBF in the Action had investigated whether the allegations in Request for Admission Nos. 15 and 16 above were true.

REQUEST FOR ADMISSION NO. 18:

GSK never communicated directly with UBF about Avandia.

REQUEST FOR ADMISSION NO. 19:

As of February 2016, UBF possessed no evidence that GSK had communicated with UBF about Avandia.

Date: May 24, 2019

/s/ Sean P. Fahey

Nina M. Gussack

Sean P. Fahey

Kyle A. Dolinsky

PEPPER HAMILTON LLP

3000 Two Logan Square

18th & Arch Streets

Philadelphia, PA 19103

(215) 981-4000

Attorneys for Defendant GlaxoSmithKline LLC

CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2019, I did cause a copy of the foregoing

Defendant GlaxoSmithKline LLC's Requests for Admission Directed to Attorney A.J. De

Bartolomeo to be served by email on the parties as follows:

Robert P. Curley, Esq.
O'DONOGHUE & O'DONOGHUE, LLP
Constitution Place, Suite 515
325 Chestnut Street
Philadelphia, PA 19106
Telephone: 215.629.4970
Facsimile: 215.629.4996
rcurley@odonoghuelaw.com

William O'Brien, Esquire
Andrew J. Trevelise, Esquire
O'BRIEN FIRM
325 Chestnut Street, Suite 1320
Philadelphia, PA 19106
Telephone: 267.758.6029
wjo@obfirm.com
ajt@obfirm.com

Andrew A. Gorlick
GORLICK, KRAVITZ & LISTHAUS, P.C.
17 State Street, 4th Floor
New York, NY 10004-1551
Telephone: 212.269.2500
Facsimile: 212.269.2540
agorlick@gkllaw.com
jmele@gkllaw.com

Peter A. Silverman
FIGLIULO & SILVERMAN, P.C.
10 South LaSalle Street, Suite 3600
Chicago, IL 60603
Telephone: 312.251.5275
psilverman@fslegal.com

Attorneys for Allied Services Division Welfare Fund

Attorneys for United Benefit Fund

Michael J. Boni
BONI, ZACK & SNYDER LLC
15 St. Asaphs Road
Bala Cynwyd, PA 19004
Telephone: 610.822.0200
Facsimile: 610.822.0206
mboni@bonizack.com

Jack A. Meyerson
Debora O'Neill
MEYERSON & O'NEILL
1700 Market Street – Suite 3025
Philadelphia, PA 19103
Telephone: 215.972.1376
jmeyerson@meyersonlawfirm.com
doneill@meyersonlawfirm.com

Attorney for A.J. De Bartolomeo

Attorneys for James Dugan II and Art Sadin

Dated: May 24, 2019

/s/ Sean P. Fahey
Sean P. Fahey